

George Haines, Esq.
Nevada Bar No. 9411
Gerardo Avalos, Esq.
Nevada Bar No. 15171
FREEDOM LAW FIRM, LLC
8985 South Eastern Ave., Suite 350
Las Vegas, NV 89123
Phone: (702) 880-5554
FAX: (702) 385-5518
Email: info@freedomlegalteam.com
Attorneys for Plaintiff Lisa Espitia

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Lisa Espitia,

Plaintiff,

v.

Experian Information Solutions, Inc.;
Conn Appliances, Inc. and Synchrony
Bank,

Defendants.

Case No.: 2:23-cv-00028

**Motion for an extension of time for
Defendant Experian Information
Solutions, Inc. to respond to
Plaintiff's complaint**

First Request

Lisa Espitia ("Plaintiff"), by and through counsel, hereby requests an extension of time for Defendant Experian Information Solutions, Inc. ("Defendant") to respond to Plaintiff's complaint. Defendant's responsive pleading was due on January 30, 2022.

The extension is sought because the parties are engaged in active settlement discussions and informal discovery to assist the case resolution efforts. Plaintiff does not oppose an extension of Defendant's time to answer the complaint so that the parties may devote their energies to resolving this

1 matter.

2 This is the first request for an extension of this deadline and the request
3 is made after the deadline has expired due to excusable neglect. Through
4 counsel, Defendant requested that Plaintiff stipulate to an extension on January
5 30, 2022 but Plaintiff's Counsel did not agree until January 31, 2022, one day
6 after the deadline.

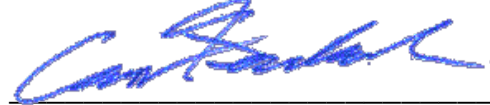
7 In good faith and not for the purposes of delay, Plaintiff submits this
8 motion, on behalf of Defendant, and requests that this Court extend Defendant's
9 deadline to file its responsive pleading until on or before **February 20, 2023**.

10 Dated: January 31, 2023.

11 **FREEDOM LAW FIRM, LLC**

12
13 /s/ Gerardo Avalos
14 George Haines, Esq.
15 Gerardo Avalos, Esq.
16 8985 South Eastern Ave., Suite 350
17 Las Vegas, NV 89123
18 *Attorneys for Plaintiff*

19
20 IT IS SO ORDERED:

21 

22 UNITED STATES MAGISTRATE JUDGE

23
24 DATED: 2-6-2023